

EMERY CELLI BRINCKERHOFF & ABADY LLP

RICHARD D. EMERY
ANDREW G. CELLI, JR.
MATTHEW D. BRINCKERHOFF
JONATHAN S. ABADY
EARL S. WARD
ILANN M. MAAZEL
HAL R. LIEBERMAN
DANIEL J. KORNSTEIN
O. ANDREW F. WILSON
ELIZABETH S. SAYLOR
KATHERINE ROSENFELD
DEBRA L. GREENBERGER
ZOE SALZMAN
SAM SHAPIRO

ATTORNEYS AT LAW
600 FIFTH AVENUE AT ROCKEFELLER CENTER
10TH FLOOR
NEW YORK, NEW YORK 10020

TEL: (212) 763-5000
FAX: (212) 763-5001
www.ecbalaw.com

DIANE L. HOUK
EMMA L. FREEMAN
DAVID BERMAN
HARVEY PRAGER
SCOUT KATOVICH
MARISSA BENAVIDES
NICK BOURLAND
ANDREW K. JONDAHL
ANANDA BURRA
MAX SELVER

June 22, 2020

Via ECF

Hon. Laura T. Swain
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Alexis Sklair, et al. v. Mike Bloomberg 2020, Inc., No. 20 Civ. 2495

Dear Judge Swain,

We represent Plaintiffs and the putative class in the above-referenced matter. We write pursuant to Section B.II of your Honor's individual rules to inform the Court that Plaintiffs will amend their complaint as of right in response to Defendant's pending motion to dismiss. *See* ECF No 20. Plaintiffs will file their amended complaint within 21 days of Defendant's motion by July 6, 2020. *See* Fed. R. Civ. P 15(a)(1)(B) (requiring an amended pleading to be filed within "21 days after service of a responsive pleadings or 21 days after service of a motion under Rule 12(b), (e), or (f)").

The parties are conferring on a proposed briefing schedule in the event that Defendant moves to dismiss Plaintiffs' amended complaint. We will submit a schedule for the Court's consideration in the coming days, or separate proposals if the parties cannot agree upon a joint proposed schedule.

EMERY CELLI BRINCKERHOFF & ABADY LLP
Page 2

Respectfully Submitted,

Ilann M. Maazel
David Berman

GUPTA WESSLER PLLC

Peter Romer-Friedman

1900 L Street, NW, Suite 312
Washington, DC 20036
Phone: (202) 888-1741

cc. All Counsel of Record